

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA  
SACRAMENTO DIVISION

|                                  |   |                              |
|----------------------------------|---|------------------------------|
| BRODRICK BONE,                   | ) |                              |
|                                  | ) | 2:20-cv-00615-JDP (SS)       |
| Plaintiff,                       | ) |                              |
|                                  | ) |                              |
| vs.                              | ) | STIPULATION AND ORDER FOR AN |
| ANDREW SAUL,                     | ) | EXTENSION OF TIME            |
| Commissioner of Social Security, | ) |                              |
|                                  | ) | ECF No. 19                   |
| Defendant.                       | ) |                              |
|                                  | ) |                              |
|                                  | ) |                              |

IT IS HEREBY STIPULATED, by and between the parties, through their respective counsel of record, that Defendant shall have a 30-day extension of time from February 1, 2021 to March 3, 2021 to respond to Plaintiff's motion for summary judgment. Since Plaintiff filed his brief. Defendant's counsel had to take time off work due to a shoulder injury and is working at a reduced speed. Defendant's counsel has six briefs due in other social security cases in February and is responsible for reviewing the briefs and other assignments of a new law clerk. Defendant's counsel additionally has to expend significant time monitoring the status of the electronic administrative records (ecars) in three jurisdictions due to covid related delays. Counsel, therefore, requests additional time to review the record and draft the responsive motion. Defendant's counsel apologizes to the Court and Plaintiff for this delay.

This request is made in good faith with no intention to unduly delay the proceedings.

1 The parties further stipulate that the Court's Scheduling Order shall be modified  
2 accordingly.

3  
4 Respectfully submitted,

5 Dated: January 29, 2021

/s/ Jesse S. Kaplan by Chantal R. Jenkins\*

\*As authorized via email on January 29, 2021

Jesse S. Kaplan

Attorney for Plaintiff

8  
9 Dated: January 29, 2021

McGREGOR W. SCOTT

United States Attorney

DEBORAH LEE STACHEL

Regional Chief Counsel, Region IX

Social Security Administration

13 By: /s/ Chantal R. Jenkins

CHANTAL R. JENKINS


Special Assistant United States Attorney

**ORDER**

The parties' stipulation for an extension of time is approved and so ordered.

IT IS SO ORDERED.

Dated: February 2, 2021

  
\_\_\_\_\_  
JEREMY D. PETERSON  
UNITED STATES MAGISTRATE JUDGE